

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Specification and Claims

Claim 1 has been amended to recite a single light guide medium for guiding light from the LED die to a light output so as to impinge the light on the surface of an object.

Support for the recitation of a “single medium” is found in the original drawings and in line 16 on page 3, which contrasts the “single medium” of the invention with the multiple media of the prior art. Therefore, the recitation of the single medium does not constitute “new matter.”

Support for the recitation of light passing through the outlet to impinge on a surface of an object is found in lines 11-12 on page 3, and therefore the recitation of light impinging on the object surface also does not constitute “new matter.”

The changes to the specification are all grammatical or idiomatic in nature and clearly do not constitute “new matter.”

2. Rejection of Claims 1-6 Under 35 USC §102(b) in view of U.S. Patent Publication No. 2005/0127543 (Ricking)

This rejection is respectfully traversed on the grounds that the Ricking publication discloses a light guide made up of two media (21,41), whereas claim 1 positively recites a single medium in which the LED die is disposed, and which guides light between the LED die and a light output.

By limiting the light path to a single medium, as recited in claim 1, the claimed invention provides at least two advantages: (i) it eliminates transmission losses that occur at the interface between media, resulting in higher efficiency relative to the light guide of Ricking; and (ii) the

Serial Number 10/811,885

single media is simpler to manufacture. Because of these advantages, the claimed invention cannot be considered to be merely a matter of design choice.

Furthermore, it is noted that while one of the media of Ricking has a curved surface, the curved surface does not reflect light to the output, as recited in claim 2. Instead, light must pass through the curved surface on its way to the output, which consists of lenses 22. Therefore, Ricking does not suggest the feature of a curved reflecting surface as recited in claim 2.

Finally, it is respectfully noted that Ricking is specifically directed to a "method for producing light-guiding bodies in two spatially and temporally separate steps. Not only does Ricking fail to disclose or suggest the claimed single medium, but it actually teaches away from such a single medium. To modify the light guide (LED/lens) structure disclosed in Ricking in order to eliminate the second medium would be completely contrary to the objectives and teachings of Ricking. In effect, the Ricking publication teaches away from the claimed invention by specifically disclosing a two step process that results in two media, rather than the claimed single medium.

Because the Ricking patent does not disclose or suggest the claimed light guide module, withdrawal of the rejection of claims 1-6 under 35 UsC §102(b) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, expedited passage of the application to issue is requested.

Respectfully submitted,

BACON & THOMAS, PLLC



Date: October 13, 2005

By: BENJAMIN E. URCIA
Registration No. 33,805

Serial Number 10/811,885



BACON & THOMAS, PLLC
625 Slaters Lane, 4th Floor
Alexandria, Virginia 22314

Telephone: (703) 683-0500

NWB:S:\Producer\ben\Pending A...INC\CHU 811885w01.wpd